

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PARKER PELHAM, Individually and on Behalf of)		
All Other Similarly Situated,)		
)	
Plaintiff,)		C.A. No. 23-162-CFC-SRF
)	
v.)		
)	
VBIT TECHNOLOGIES CORP., VBIT MINING)		
LLC, ADVANCED MINING GROUP, DANH)		
CONG VO a/k/a DON VO, PHUONG D VO a/k/a)		
KATIE VO, SEAN TU, JIN GAO, LILLIAN)		
ZHAO, and JOHN DOE INDIVIDUALS 1-10, and)		
DOE COMPANIES 1-10,)		
)	
Defendants.)		

DECLARATION OF PHUONG “KATIE” VO

I, Phuong “Katie” Vo, hereby declare as follows:

1. I was formally employed at VBit Technologies Corp. (“VBit Tech”) from January 1, 2019 to April 29, 2022. My only role at VBit Tech was in an administrative role.
2. I have been a resident in Pennsylvania during my employment at VBit Tech, and am still a resident in Pennsylvania.
3. On December 28, 2018, I executed an Employment Contract for full time employment starting on January 1, 2019 (the “Employment Contract”). This Employment Contract was specifically between myself and VBit Technologies Corp. Attached hereto as **Exhibit “A”** is a true and correct copy of my December 28, 2018 Employment Contract.
4. My Employment Contract identifies my job as “permanent full-time employment with the Employer” with an internal job title of Operations Director. (See Page 1, ¶ 2 of Exhibit “A”). This is an administrative role.
5. The following are the administrative job duties found within my Employment

Contract:

- “Train members of the Admin support team;
- Lead the Admin team in their daily duties;
- Help answer customer support tickets; and
- Help develop training manuals for new hires on daily admin team processes.” (See Pages 1-2, ¶ 2 of Exhibit “A”).

6. Further, the Employment Contract states that “[t]he Employee agrees to be employed on the terms and conditions set out in this [Employment Contract]. The Employee agrees to be subject to the general supervision of and act pursuant to the orders, advice and direction of the Employer.” (See Page 2, ¶ 3 of Exhibit “A”).

7. My role at VBit Tech was limited to an administrative assistant role – I was neither an officer, director, nor manager at VBit Tech.

8. I was never given authority to be an officer, director, or manager at VBit Tech.

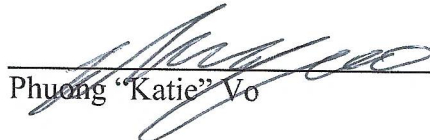
9. I was never employed by VBit Mining or Advanced Mining.

10. I was once married to Mr. Vo, but we have been separated for some time and our divorce has recently been finalized.

11. I have never received any Summons and/or Complaint, or any other document, from Plaintiff Parker Pelham (“Plaintiff”) at any time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of November, 2023.


Phuong “Katie” Vo